

IN THE COURT OF COMMON PLEAS OF LAWRENCE COUNTY, PENNSYLVANIA

ANNE PAPA,

Plaintiff,

v.

NESHANNOCK VFD, NESHANNOCK VFD
BOARD, JOHN D. DICOLA, CHIEF AND
INDIVIDUALLY, BRADLEY SHAFFER,
DEPUTY AND INDIVIDUALLY, AND
BRIAN MELCER, DEPUTY AND
INDIVIDUALLY,

Defendants.

CIVIL DIVISION

10701 of 2020ca

**PRAECIPE FOR RULE TO FILE
COMPLAINT**

Filed on Behalf of Defendants,
*Neshannock VFD, Neshannock VFD Board,
John D. Dicola, Chief and individually,
Bradley Shaffer, Deputy and individually, and
Brian Melcer, Deputy and individually.*

Counsel of Record for This Party:

Bruce E. Rende, Esquire
PA I.D.#52714

Timothy D. Iannini, Esquire
PA I.D. #205572

ROBB LEONARD MULVIHILL LLP
Firm #249
BNY Mellon Center
500 Grant Street, Suite 2300
Pittsburgh, PA 15219

Telephone: (412) 281-5431
Facsimile: (412) 281-3711

JURY TRIAL DEMANDED

FILED/ORIGINAL

2020 OCT 30 AH10: 17

JODI KLABON-ESOLDO
PRO AND CLERK

IN THE COURT OF COMMON PLEAS OF LAWRENCE COUNTY, PENNSYLVANIA

ANNE PAPA,

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v.

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BOARD, JOHN D. DICOLA, CHIEF AND
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PRAECIPE FOR RULE TO FILE COMPLAINT

TO THE PROTHONOTARY:

Will you please issue a Rule upon the Plaintiff to file a Complaint in the within action
within twenty (20) days from the date of service of the Rule or suffer a judgment of non-pros.

Respectfully submitted,

ROBB LEONARD MULVIHILL LLP

By: /s/Bruce E. Rende
Bruce E. Rende, Esquire
*Attorneys for Defendants, Neshannock VFD,
Neshannock VFD Board, John D. Dicola, Chief and
individually, Bradley Shaffer, Deputy and
individually, and Brian Melcer, Deputy and
individually.*

FILED/ORIGINAL

2020 OCT 30 AM 10:17

JODI KLABON-ESOLDO
PRO AND CLERK

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the within Praeipce For Rule To File Complaint was served this 28th day of October, 2020 via First Class Mail, postage prepaid upon the following:

Angelo A. Papa, Esquire
Signature Hill Legal
318 Highland Avenue
New Castle PA 16101

/s/Bruce E. Rende
Bruce E. Rende, Esquire

FILED/ORIGINAL

2020 OCT 30 AM 10:17

JODI KLABON-ESOLDO
PRO AND CLERK

ROBB LEONARD MULVIHILL

ATTORNEYS AT LAW

October 28, 2020

Bruce E. Rende
brende@rlmlawfirm.com
Also admitted in WV & OH

Jodi Klabon-Esoldo
Lawrence County Government Center
Prothonotary Office
430 Court Street
New Castle, PA 16101

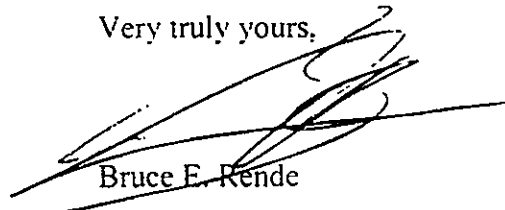
RE: Anne Papa v. Neshannock VFD, Neshannock VFD Board, John D. Dicola,
Chief and individually, Bradley Shaffer, Deputy and individually, and Brian
Melcer, Deputy and individually.
Claim No: PATR20100579-00001
Our File No: 26674BER

Dear Ms. Klabon-Esoldo:

Enclosed please find the Defendants' Praecipe for Rule to File Complaint for filing in the above-referenced matter.

If you have any questions or concerns, please do not hesitate to contact us.

Very truly yours,



Bruce E. Rende

BER/evm
Enclosures

cc: Angelo A. Papa, Esquire (w/o enclosures)

RECEIVED
OCT 30 2020
PRO & CLERK

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